

EXHIBIT 6

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#10042

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**Attorneys for Court-Appointed Receiver
W. Lawrence Patrick**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

WB MUSIC CORP., et al.,

Plaintiffs,

v₁

**ROYCE INTERNATIONAL
BROADCASTING CORP., et al.**

Defendants.

CASE NO.: 5:16-cv-00600-JGB (SPx)

Hon. Jesus G. Bernal

**DECLARATION OF W.
LAWRENCE PATRICK IN
SUPPORT OF RECEIVER W.
LAWRENCE PATRICK'S MOTION
FOR AN ORDER APPROVING OF
RECEIVER'S FINAL REPORT
AND ACCOUNTING AS TO ALL
DEFENDANTS EXCEPT SILVER
STATE BROADCASTING, LLC,
AND GOLDEN STATE
BROADCASTING AND AN
AWARD OF FEES AND COSTS**

DATE: February 27, 2023
TIME: 9:00 a.m. PST

COURTROOM: Dept. 1

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1 DECLARATION OF W. LAWRENCE PATRICK

2 I, W. LAWRENCE PATRICK, , declare as follows:

3 1. I am the Court-Appointed Receiver in the above-entitled action. I make this
4 declaration in support of Receiver W. Lawrence Patrick's Motion for an Order Approving of
5 Receiver's Final Report and Accounting and an Award of Fees and Costs. I have personal
6 knowledge of the facts set forth herein, and if called upon to testify thereto, I could and would
7 competently do so under oath.

8 2. I have reviewed the requests of counsel and believe they reflect necessary and
9 reasonable fees and costs incurred in assisting me as the Receiver.

10 3. The Receiver's accounting is set forth below and each section identifies the relevant
11 exhibits where backup for the accounting may be found.

12 (1) The Receiver's fees and costs with a total of \$259,122.06. This Court previously
13 awarded \$139,122.06 in fees and out-of-pocket expenditures¹. The Receiver is
14 owed an additional \$120,000.00 in monthly fees for 16 months of service
15 between September 2021 and December 2022, compensated at \$7,500/month as
16 per this Court's Order Appointing W. Lawrence Patrick as Receiver. (Dkt. No.
17 284 at 3).

18 (2) Receiver's counsel's (Glaser Weil LLP) fees and costs, with a total of
19 \$991,789.17. This Court previously awarded \$333,680.54 in fees and costs.
20 Glaser Weil LLP is owed an additional \$658,108.63 for services rendered
21 between July 16, 2021 and December 2022. Attached as Exhibit A to Declaration
22 of Fred D. Heather are detailed invoices for that period.

23 (3) FCC counsel's (Sciarrino & Shubert, PLLC) fees and costs with a total of
24 \$209,229.17. This Court previously awarded \$117,537.50 in fees and costs.
25 Sciarrino & Shubert are owed an additional \$91,691.67 for services rendered

26
27 ¹ In its August 26, 2021 Order, this Court awarded the Receiver, his counsel and FCC counsel
28 various amounts for their services between July 2020 and July 2021. The Receiver was awarded
\$34,122.06 in out-of-pocket expenditures and \$105,000.00 in monthly fees. Dkt. No. 486 at 4.

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between July 2021 and November 2022. Attached as Exhibit A to the Declaration of Dawn M. Sciarrino are detailed time records for this period.

(4) Bankruptcy counsel's (Fox Rothschild LLP) fees and costs with a total of \$617,936.55 for services rendered between November 2021 and December 2022. Attached as Exhibit B to the Declaration of Brett A. Axelrod are detailed time records for that period.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on January 13th 2023 at Cody, WY.

•ADDITIONAL INFORMATION

W. Lawrence Patrick
W. LAWRENCE PATRICK

Glaser Weil